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BY ECF

July 6, 2021

Honorable Denise L. Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Zaquan McCutchen*
Dkt. No.: 19-CR-275

*Granted on the condition
that the defendant
receive permission in
advance on each occasion
from his pretrial
supervision officer*
Denise Cote
7/7/21

Dear Judge Cote:

I am CJA counsel to Defendant Zaquan McCutchen in the above-referenced matter. I write to respectfully request that the Court modify Mr. McCutchen's conditions of release to permit him to travel to the District of New Jersey.

While Mr. McCutchen's daughter is home from school for the summer, he would like to be able to take her to various kid-friendly events and activities in the District of New Jersey.

By way of background, Mr. McCutchen made his initial appearance on March 19, 2019 before the Honorable James L. Cott. Judge Cott ordered Mr. McCutchen's pretrial release on a \$250,000 personal recognizance bond, to be signed by six financially responsible people, home detention with electronic monitoring and travel restricted to the Southern and Eastern Districts of New York. On December 30, 2019, Your Honor modified Mr. McCutchen's condition of release from home detention with electronic monitoring to a curfew enforced by location monitoring, with the curfew hours to be set at the discretion of Pretrial Services. In March 2021, Your Honor further modified Mr. McCutchen's conditions of release to eliminate the electronic monitoring condition. Mr. McCutchen has, at all times, remained compliant with all of the conditions of his release.

I have spoken with Pretrial Services, by officer Dominique Jackson, and they have no objection to this request. The government defers to Pretrial's position.

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone

Edward V. Sapone

cc: A.U.S.A. Frank Balsamello
A.U.S.A. Matthew Hellman
P.T.S.O. Jonathan Lettieri